

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE**

IN RE:

MORRIS L. GOOCH
2153 BYRUM AVENUE
NASHVILLE, TN 37203
SSN: XXX-XX-8932

Debtor.

)
) **BK. NO. 3:14-bk-08490**
) **CHAPTER 13**
) **JUDGE KEITH M. LUNDIN**
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THE DEADLINE FOR FILING A TIMELY RESPONSE IS: JUNE 28, 2016. IF A RESPONSE IS TIMELY FILED, THE HEARING WILL BE: JULY 13, 2016, 8:30 a.m., Courtroom 1, 2nd Floor Customs House, 701 Broadway, Nashville, TN 37203

NOTICE OF MOTION TO AMEND PLAN TO SUSPEND CHAPTER 13 PAYMENTS

Debtors have asked the court for the following relief: TO AMEND PLAN

1. File with the court your written response or objection explaining your position at:

By Mail: US Bankruptcy Court, PO Box 24890, Nashville, TN 37202-4890
In Person: US Bankruptcy Court, 701 Broadway, 1st Floor, Nashville, TN
(Monday-Friday, 8:00 a.m. - 4:00 p.m.)

2. **Your response must state that the deadline for filing responses is June 28, 2016, the date of the scheduled hearing is July 13, 2016, and the motion to which you are responding is Motion to Amend.** If you want a file stamped copy returned, you must include an extra copy and a self-addressed, stamped envelope.

3. You must also mail a copy of your response to:

J. Michael Combs
Attorney at Law
700 Craighead Street
Suite 105
Nashville, TN 37204

Chapter 13 Trustee
P. O. Box 340019
Nashville, TN 37203-0019

U. S. Trustee
318 Customs House
701 Broadway
Nashville, TN 37203

If a timely response is filed, the hearing will be held at the time and place indicated above. **THERE WILL BE NO FURTHER NOTICE OF THE HEARING DATE.** You may check whether a timely response has been filed by calling the Clerk's office at 615-736-5584 or viewing the case on the Court's website at <www.tnmb.uscourts.gov>. If you received this notice by mail, you may have three additional days in which to file a timely response under Rule 9006(f) of the Federal Rules of Bankruptcy Procedure.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion and may enter an order granting that relief.

DATE: 06/06/2016

Signature: /s/ J. Michael Combs

Name: J. Michael Combs
700 Craighead Street
Suite 105
Nashville, TN 37204
615-255-7448
jmichaelcombsbk@bellsouth.net

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MOTION TO AMEND PLAN TO SUSPEND CHAPTER 13 PAYMENTS

Comes now the Debtor, by and through undersigned counsel, and would move this court to allow him to amend his Chapter 13 plan so as to suspend payments into the plan for the months of June and July 2016.

In support of this motion debtor would show as follows:

1. On May 17, 2016, he lost his job.
2. He has applied for unemployment benefits but has not yet received a reply.
3. At present he has no income and is being supported by his mother.
4. This motion if granted would interrupt payments to all creditors, both secured and unsecured, for the suspension period but should have no further effect on any creditor either secured or unsecured.

Wherefore, Debtor respectfully requests that he be allowed to suspend payments into his Chapter 13 Plan for the months of June and July 2016.

Respectfully submitted,

/s/ J. Michael Combs

J. MICHAEL COMBS

Attorney for Debtors

700 Craighead Street, Suite 105

Nashville, TN 37204

615-255-7448

jmichaelcombsbk@bellsouth.net

CERTIFICATE OF SERVICE

I hereby certify that I have mailed a copy of the foregoing to the Chapter 13 Trustee, P. O. Box 340019, Nashville, TN 37203-0019; to the U. S. Trustee, 318 Customs House, 701 Broadway, Nashville, TN 37203; and to all creditors on the attached matrix (**8 copies X \$1.00 = \$8.00**) on this 6th day of June, 2016.

/s/ J. Michael Combs

J. MICHAEL COMBS

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ORDER AMENDING PLAN TO SUSPEND CHAPTER 13 PAYMENTS

It appearing to the Court that this cause came to be heard upon the Debtor's Motion to Amend to his Chapter 13 plan so as to allow him to suspend payments into his plan for the months of June and July 2016.

It further appearing that no timely objection to this Motion has been filed with this Court;

IT IS, THEREFORE SO ORDERED.

This order was signed and entered electronically as indicated at the top of the first page.

APPROVED FOR ENTRY:

/s/ J. Michael Combs
J. MICHAEL COMBS
Attorney for Debtor(s)
700 Craighead Street, Suite 105
Nashville, TN 37204
(615) 255-7448
jmichaelcombsbk@bellsouth.net